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*Counsel for the United States of America*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

1) CHANNING WILLIAMS  
2) EVERLY JAMES  
3) KORREGAN WASHINGTON  
4) KEENAN ST. HILLAIRES  
5) MAURICE LEWIS  
6) KALEB LOUIS  
7) CODY WILLIAMS-JACKSON  
8) TORREN JAMES  
9) DOMINIQUE WASHINGTON  
10) DEMANI DANCY  
11) TREVIONNE WILLIAMS  
12) CASEY WALTERS JR.  
13) KEITH BELL  
14) DENZEL CAMPBELL  
15) TREVAUGHN JAMES  
16) DANIEL WILSON,

Defendants.

Case No.: 2:17-cr-00180-JAD-PAL

**PROPOSED COMPLEX  
CASE ORDER  
(STIPULATION)**

Pursuant to Local Rule 16-1, the United States, by and through the undersigned, and Defendants, by and through undersigned counsel, submit this Proposed Complex Case Schedule as follows:

1. Complex Case. The parties stipulate that this is a complex case within the meaning of that term under Title 18, United States Code, Section 3161(h)(7)(B)(ii), in that the nature of the prosecution is such that it is unreasonable to expect adequate trial preparation within the time limits prescribed by the Speedy Trial Act.

2. Trial Date. The parties stipulate that they seek to vacate the current trial setting for this matter on August 22, 2017, and set the matter for a firm trial setting in or about May 7, 2018. The United States anticipates it will need no more than two weeks to present its case-in-chief.

3. Excluded Time. The parties stipulate that all time from the entry of Defendants' pleas in this case until the trial of this matter is excluded under Title 18, United States Code, Section 3161(h)(7)(A) as the ends of justice outweigh the interests of the public and defendant in a speedy trial.

4. Pretrial Motions. The parties stipulate that:

A. They shall have to and including January 25, 2018 within which to file any and all pretrial motions and notice of defense;

B. They shall have twenty-one (21) days after the filing of a pretrial motion within which to file any and all responsive pleadings;

C. They shall have seven (7) days after the filing of a responsive pleading within which to file and all replies to dispositive motions.

D. For matters which have been referred to a United States Magistrate

1 Judge for Findings and Recommendations (F&R), the parties shall have fourteen (14) days  
2 from the entry of the F&R to file any objections thereto, and shall have seven (7) days after  
3 the filing of any objections to file a response, except as stipulated by the parties and  
4 approved by the Court.

5 5. The Parties' Discovery Obligations

6 A. The United States shall begin providing its Rule 16 disclosures to the  
7 defendant within thirty (30) days of arraignment and, consistent with its ongoing discovery  
8 obligations, turn over additional materials as they become available.

9 B. The defendants' Rule 16 disclosures, including, specifically,  
10 disclosures related to expert witness testimony, should be made immediately, or, in all  
11 events, no later than on or before seventy-five (75) days before the date set for trial by this  
12 Court, in order to allow for sufficient trial preparation.

13 C. The United States is not required to disclose *Jencks* material until  
14 after the government witness testifies on direct examination. 18 U.S.C. § 3500(b).  
15 Nonetheless, in the interest of efficiency, the United States will consent to disclose *Jencks*  
16 materials no later than twenty-one (21) days before trial, except: (1) with permission of the  
17 Court, for good cause shown; and (2) with the caveat that the United States does not consent  
18 to any remedy for any violation of the twenty-one (21) day disclosure deadline that would  
19 preclude it from calling a witness at trial (that is, it reserves the right to argue to the Court  
20 that exclusion of the witness is not a proper remedy).

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22 ///

1           WHEREFORE, the parties respectfully request that the Court enter a Scheduling  
2 Order addressing these issues and such other issues as the Court deems appropriate. All  
3 below undersigned counsel agree to this stipulation, except Chris Rasmussen, who  
4 represents Maurice Lewis, because he stated on behalf of his client he cannot agree to the  
5 proposed trial date.

6 DATED this 27 day of July, 2017.

7 Respectfully Submitted,

For the United States:

8 STEVEN W. MYHRE  
9 Acting United States Attorney

10 /s/ Kilby Macfadden  
11 CRISTINA D. SILVA  
12 KILBY C. MACFADDEN  
Assistant United States Attorneys

13  
14 For Defendant CHANNING  
WILLIAMS (1):

For Defendant EVERLY JAMES (2):

15  
16 /s/ Paul Riddle  
Paul Riddle  
17 Assistant Federal Public Defender

/s/ Christopher Oram  
Christopher Oram

18  
19 For Defendant KEENEN ST.  
HILAIRE (4):

For Defendant MAURICE LEWIS (5):

20  
21 /s/ Terrence Jackson  
Terrence Jackson

22 \_\_\_\_\_  
23 Chris Rasmussen  
24

1 For Defendant KALEB LOUIS (6):

For Defendant Cody Williams-Jackson (7):

2  
3 /s/ Maysoun Fletcher  
4 Maysoun Fletcher

/s/ Telia Williams  
Telia U. Williams

5 For Defendant DOMINIQUE  
6 WASHINGTON (9):

For Defendant DEMANI DANCY (10):

7 /s/ David Fischer  
8 David Fischer

/s/ Lucas Gaffrey  
Lucas Gaffrey

9  
10 For Defendant Trevionne Williams  
(11):

For Defendant Casey Walters, Jr. (12):

11  
12 /s/ Michael Miceli  
Michael Miceli

/s/ Kathleen Bliss  
Kathleen Bliss

13  
14 For Defendant KEITH BELL (13):

For Defendant Denzel Campbell (14):

15  
16 /s/ Jess Marchese  
17 Jess Marchese

/s/ Paola Armeni  
Paola Armeni

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19  
20 For Defendant Trevaughn James  
(15):

For Defendant Daniel Wilson (16):

21  
22 /s/ Russell Marsh  
Russell Marsh

/s/ Lance Maningo  
Lance Maningo

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

- 1) CHANNING WILLIAMS
- 2) EVERLY JAMES
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- 15) TREVAUGHN JAMES
- 16) DANIEL WILSON,

Case No.: 2:17-cr-00180-JAD-PAL

**COMPLEX CASE  
SCHEDULING ORDER**

This matter coming before the Court on the parties' Proposed Complex Case Schedule, the premises therein considered, and good cause showing, the Court orders as follows:

1. Complex Case. This is a complex case within the meaning of that term under Title 18, United States Code, Section 3161(h)(7)(B)(ii), in that the nature of the prosecution is such that it is unreasonable to expect adequate trial preparation within the time limits

1 prescribed by the Speedy Trial Act.

2 2. Trial Date. The current trial setting for this matter on August 22, 2017 is  
3 vacated, and rescheduled to May 8, 2018, at 9:00 a.m.. Calendar  
4 Call is set for April 30, 2018, at 1:30 p.m..

5 3. Excluded Time. The parties stipulate that all time from the entry of  
6 Defendants' pleas in this case until the trial of this matter is excluded under Title 18, United  
7 States Code, Section 3161(h)(7)(A) as the ends of justice outweigh the interests of the  
8 public and defendant in a speedy trial.

9 4. Pretrial Motions. The parties shall have:

10 A. To and including January 25, 2018, within which to file any and all  
11 pretrial motions and notices of defense;

12 B. To and including twenty-one (21) days after the filing of a pretrial  
13 motion within which to file any and all responsive pleadings;

14 C. To and including seven (7) days after the filing of a responsive  
15 pleading within which to file and all replies to dispositive motions.

16 D. For matters referred to a United States Magistrate Judge for Findings  
17 and Recommendations (F&R), the parties shall have fourteen (14) days from the entry of the  
18 F&R to file any objections thereto, and shall have seven (7) days after the filing of any  
19 objections to file a response, except as stipulated by the parties and approved by the Court.


20 5. The Parties' Discovery Obligations

21 A. The United States shall begin providing its Rule 16 disclosures to the  
22 defendant within thirty (30) days of arraignment and, consistent with its ongoing discovery  
23 obligations, turn over additional materials as they become available.  
24

1                   B.       The defendants' Rule 16 disclosures, including, specifically,  
2 disclosures related to expert witness testimony, should be made immediately, or, in all  
3 events, no later than on or before seventy-five (75) days before the date set for trial by this  
4 Court, in order to allow for sufficient trial preparation.

5                   C.       The United States is not required to disclose *Jencks* material until  
6 after the government witness testifies on direct examination. 18 U.S.C. § 3500(b).  
7 Nonetheless, in the interest of efficiency, the United States will consent to disclose *Jencks*  
8 materials no later than twenty-one (21) days before trial, except: (1) with permission of the  
9 Court, for good cause shown; and (2) with the caveat that the United States does not consent  
10 to any remedy for any violation of the twenty-one (21) day disclosure deadline that would  
11 preclude it from calling a witness at trial (that is, it reserves the right to argue to the Court  
12 that exclusion of the witness is not a proper remedy).

13 **IT IS SO ORDERED:**

14  
15   
16 HONORABLE PEGGY A LEEN

17 UNITED STATES MAGISTRATE JUDGE  
18  
19  
20  
21  
22  
23  
24

August 17, 2017

Date



**CERTIFICATE OF SERVICE**

A copy of the foregoing **PROPOSED COMPLEX CASE ORDER**  
**(STIPULATION)** was served on counsel of record by Electronic Case Filing on this 27<sup>th</sup>  
day of July 2017.

/s/ Kilby Macfadden  
Kilby Macfadden  
Assistant United States Attorney